REMARKS

Applicant respectfully requests the reconsideration of the present application and the consideration of the following remarks.

Claims 14, 16-25, 28, 30-35 and 38-39 were rejected under 35 U.S.C. 103(a) as being unpatentable over Jordan (U.S. Patent 5,745,113) in view of Adobe (Adobe PageMill User Guide version 2.0) and Simpson (Mastering WordPerfect 5.1 & 5.2 for Windows, pp. 993-1003). New claims 40-51 are added; thus, claims 14, 16-25, 28, 30-35 and 38-51 are pending.

Applicant respectfully submits that the cited references, including Jordan, Adobe and Simpson, do not teach user defined HTML library objects which can be used as templates to generate new objects in a new page. Further, as a whole, Jordan, Adobe and Simpson do not fairly suggest the subject matter as claimed in the pending claims. A detailed discussion is presented below.

Claim 46, for example, recites:

46. (New) A method to edit web documents, the method comprising:
displaying representations of a plurality of library objects, the plurality
of library objects comprising at least one user defined HTML
(Hypertext Mark-up Language) library object, each of
representations of the plurality of library objects being
selectable to generate an object in a web document using a
corresponding one of the plurality of library objects as a
template; and

generating an object in the web document using a selected one of the plurality of library objects as a template.

The cited references do not specifically suggest <u>user defined HTML</u> library objects. For example, Jordan shows a map editor that is a drawing editor. Jordan does not show user defined HTML library objects. Jordan was filed in 1996, the year of the effective filing date of the present application. The fact that there is no discussion of HTML objects in Jordan is a clear indication of non-obviousness of incorporating HTML objects into the system of Jordan. The Office Action asserted "it was well known to implement user interfaces such as Jordan's with HTML capability." However, the effective filing date of the present application is September 27, 1996. Applicant respectfully requests evidences that can support this assertion.

Even if one would implement user interfaces such as Jordan's with HTML capability, there is no indication that <u>user defined HTML</u> library objects would be allowed. At most, one would use Jordan map editor with <u>HTML</u> editing techniques available in 1996. For example, reference "Adobe" (released in April 1996) describes an HTML editor available in 1996. Adobe PageMill, described in reference "Adobe", was a commercial product for editing web pages. The fact that there is no discussion of user defined HTML objects in Adobe PageMill is a clear indication of non-obviousness.

Thus, when viewed together, Adobe and Jordan do not fairly suggest the use of <u>user defined HTML</u> library objects.

Simpson was relied upon in the Office Action to show "the user-define objects and the pre-defined objects can be displayed in a single palette." Thus, when viewed together, Adobe, Jordan and Simpson do not suggest the idea of using user defined HTML library objects as templates.

Independent claims 14, 20 and 31 recite "a user defined HTML object as a template for creation of a new object in a web page". Independent claim 40 recites "displaying representations of a plurality of library objects, the plurality of library objects comprising at

least one user defined HTML (Hypertext Mark-up Language) library object, each of representations of the plurality of library objects being selectable to generate an object in a web document using a corresponding one of the plurality of library objects as a template." Thus, at least for the above reasons, the independent claims are not obvious over the cited references.

Further, one embodiment of the present invention, the structure of the web page is displayed in a page structure panel (e.g., 608 in Figure 6A). Editing the web page is through manipulating the objects in the page structure panel. Such an approach is significantly different from WYSIWYG (What You See Is What You Get) editors. In one embodiment of the present invention, a preview button (e.g., 604 in Figure 6A) can be used to preview the web page by sending an interprocess communication signal to a web browser (see, e.g., page 25, lines 20-23 of the specification). For example, claim 49 recites:

49. (New) The method of claim 46, further comprising:
displaying a structure of objects of the web document using
representations of the objects of the web document

The editors of Adobe, Jordan and Simpson are all the WYSIWYG type. These editors do not show the structure of objects in the document. Further, claims 50 and 51 recite:

- 50. (New) The method of claim 49, wherein the structure of the objects of the web document is displayed without rendering the web document; the method further comprises:
 causing the web document to be rendered to be previewed in response to a user input.
- 51. (New) The method of claim 50, wherein the web document is caused to be rendered in a web browser for preview through an interprocess communication signal.

Thus, Applicant believes that the pending claims are patentable over the applied references.

Please charge any shortages or credit any overages to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

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Lehua Wang

Reg. No. 48,023

12400 Wilshire Boulevard

Seventh Floor

Los Angeles, California 90025-1026

(408) 720-8300